

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No: 1:23-cv-00108-LMB-JFA

**DECLARATION OF NOREEN YEH IN SUPPORT OF NON-PARTY TIKTOK, INC.’S
MOTION TO REDACT**

I, Noreen Yeh, declare as follows:

1. I am an eDiscovery Analyst at TikTok, Inc. (“TikTok”). I am familiar with TikTok’s business practices, including what TikTok considers confidential and does not disclose to the public. I have personal knowledge of the facts described below and make this Declaration in support of TikTok’s Motion to Redact pursuant to Local Rule 5(C).

2. **DTX 250, DTX 2520, DTX 2521, and DTX 2522** are internal TikTok financial spreadsheets that contain highly sensitive information concerning TikTok’s revenue derived from advertising tools from 2019 to 2022. *See* ECF No. 894, at 20, 152. The documents each contain customer identifiers and account names as well as specific revenue amounts derived from each customer. TikTok is a private company and does not publicly disclose this type of internal revenue information because it is proprietary, confidential, and competitively sensitive. If this information was disclosed to the public, it could be used by TikTok’s competitors to target TikTok customers, directly impact TikTok’s valuation, replicate TikTok’s advertising strategies, and cause competitive harm to TikTok.

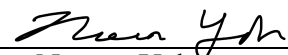
3. **DTX 1974** is a table contained in Google’s expert report for Mark Israel. *Id.* at 131. The table summarizes the financial spreadsheets described above. The document contains

highly confidential, competitively sensitive information that directly relates to TikTok's revenue and customers. TikTok, which is a private company, does not publicly disclose this type of highly confidential, competitively sensitive information. If disclosed, it would allow a comparison of TikTok's revenue derived from advertising tools to similar revenue derived by competitors and potential competitors. The public has little, if any, interest in this non-party information and the competitive harm that disclosure would create for TikTok outweighs the slight public interest that may exist.

4. **DTX 1990 and DTX 1991** are tables contained in Google's expert report for Mark Israel. *Id.* The tables summarize the financial spreadsheets described above, as well as data from other sources, and purport to calculate the market shares of listed companies, including TikTok. The documents contain highly confidential, competitively sensitive information that directly relates to TikTok's valuation and market share. TikTok, which is a private company, does not publicly disclose this type of highly confidential, competitively sensitive information. If disclosed, it would allow a comparison of TikTok's market share associated with advertising tools to the market shares of competitors and potential competitors. The public has little, if any, interest in this non-party information and the competitive harm that disclosure would create for TikTok outweighs the slight public interest that may exist.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on: July 26, 2024


Noreen Yeh